

**THE LAW OFFICES OF GEORGE RIKOS**

George Rikos (SBN 204864)  
1307 Stratford Court  
Del Mar, Ca 92014  
Telephone: (858) 342-9161  
Facsimile: (858) 724-1453  
Email: George@georgerikoslaw.com

**NICHOLAS & BUTLER, LLP**

Craig M. Nicholas (SBN 178444)  
Alex M. Tomasevic (SBN 245598)  
Mei-Ying Imanaka (SBN 280472)  
225 Broadway, 19<sup>th</sup> Floor  
San Diego, California 92101  
Telephone: (619) 325-0492  
Facsimile: (619) 325-0496  
Email: cnicholas@nblaw.org  
Email: atomasevic@nblaw.org  
Email: mimanaka@nblaw.org  
Attorneys for Plaintiff Renata Bonar

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF CALIFORNIA**

RENATA BONAR, an individual; on behalf  
of himself and all others similarly situated,  
and on behalf of the general public,

Plaintiffs,

vs.

BEAM GLOBAL SPIRITS & WINE, INC.,  
and DOES 1-25, Inclusive,

Defendants.

CASE NO.: 11-cv-02058-CAB-WMC

**NOTICE OF MOTION AND  
MOTION FOR LEAVE TO FILE A  
FIRST AMENDED COMPLAINT**

The Honorable Cathy Ann Bencivengo  
The Honorable Karen S. Crawford

Hearing: April 12, 2013  
Time: 2:30 p.m.

1 PLEASE TAKE NOTICE THAT on April 12, 2013 at 2:30p.m., or as soon thereafter as  
2 counsel may be heard in the above entitled Court, located at 940 Front Street, San Diego,  
3 California 92101, in the courtroom of Judge Cathy Ann Bencivengo, Plaintiff Renata Bonar will  
4 and hereby does move the Court for leave to file an amended complaint in this matter pursuant to  
5 Rule 15(a)(2) of the Federal Rules of Civil Procedure. A copy of her proposed First Amended  
6 Complaint is attached to and filed with this motion as **Exhibit A** to the Declaration of George  
7 Rikos. Plaintiff wishes to add as defendants Skinny Girl Cocktails, LLC and S.G.C. Global, LLC  
8 and as a Plaintiff Justin Stockton to all existing claims. This motion is based on facts obtained  
9 from Defendant Beam Global Spirit & Wine, Inc. during the discovery process.

10 This motion is based on this Notice of Motion and Motion, the following attached  
11 Memorandum of Points and Authorities, the declaration of George Rikos in support, the pleadings  
12 and papers on file in this action, and upon such other matters as may be presented to the Court at  
13 the time of hearing.

14 Respectfully submitted,

15  
16  
17 Dated: January 10, 2013

*/s/ George Rikos*

By: \_\_\_\_\_  
George Rikos

Attorneys for Plaintiff Renata Bonar